

GREENSPOON MARDER LLP
 3993 Howard Hughes Parkway, Suite 400
 Las Vegas, Nevada 89169
 Phone: (702) 978-4249/ Fax: (945) 333-4256

Richard W. Epstein, Esq. (admitted *Pro Hac Vice*)
 Jeffrey Backman, Esq. (admitted *Pro Hac Vice*)
 Michelle Durieux, Esq. (admitted *Pro Hac Vice*)
 GREENSPOON MARDER LLP
 200 East Broward Blvd., Ste. 1800
 Fort Lauderdale, FL 33301
 Tel: 954 491-1120
 Facsimile: 954-343-5624
Richard.Epstein@gmlaw.com
Jeffrey.Backman@gmlaw.com
Michelle.Durieux@gmlaw.com

Phillip A. Silvestri, Esq.
 Nevada Bar No. 11276
 GREENSPOON MARDER LLP
 3993 Howard Hughes Parkway, Ste. 400
 Las Vegas, NV 89169
 Tel: 702-978-4249
 Fax: 954-333-4256
Phillip.Silvestri@gmlaw.com

Kimberly Maxson-Rushton
 Nevada Bar No. 5065
 Gregory Kraemer
 COOPER LEVENSON, P.A.
 3016 W. Charleston Blvd., #195
 Las Vegas, NV 89102
 T: (702) 366-1125
 F: (702) 366-1857
krushton@cooperlevenson.com
gkraemer@cooperlevenson.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
 DEVELOPMENT, LLC, a Delaware Limited
 Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
 TIMESHARE EXIT TEAM, a Washington
 Limited Liability Company; BRANDON
 REED, an individual and citizen of the State of
 Washington; TREVOR HEIN, an individual
 and citizen of Canada; THOMAS

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND
 ORDER TO EXTEND DEADLINE TO
 RESPOND TO SGB'S MOTION TO
 DISMISS [ECF #204]**

[Third Request]

PARENTEAU, an individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Plaintiff”), and Defendant Schroeter, Goldmark & Bender, P.S. (“SGB”), hereby stipulate to extend Plaintiff’s deadline to file a response to SGB’s Special Motion to Dismiss Pursuant to NRS 41.660 [ECF #204]¹ (the “Motion”), currently set for June 5, 2020, until June 19, 2020, and as grounds state as follows:

1. On May 1, 2020, SGB filed the subject Motion.
2. Since SGB filed the Motion, both Plaintiff and SGB have been required to respond to voluminous discovery requests and respond to various motions filed in this case. *See*, e.g., Plaintiff’s Responses to SGB’s Motion for Protective Order, [ECF #216], and Reed Hein’s Motion to Compel [ECF #214], and SGB’s response to Diamond’s Motion to Exceed the Deposition Limit [ECF #215], all filed on May 8, 2020. Additionally, Diamond has responded to the Defendants’ oppositions to Diamond’s Motion to Exceed the Deposition Limit.
3. Since SGB filed, Plaintiff has been diligently working to respond to the Motion, and Diamond’s response is well underway.
4. As previously referenced, a personal issue arose that prevented Plaintiff from being able to file a response to SGB’s Motion prior to the then-current deadline of May 29, 2020. On that basis, the Court granted Diamond’s request to extend the deadline to June 5, 2020. Unfortunately, this issue has taken longer to resolve than anticipated, and Plaintiff is unable to

¹ The Motion was originally filed as ECF #202, but a corrected image was filed as ECF #204.

1 file by current deadline of June 5, 2020.

2 5. In addition, the undersigned is undergoing a medical procedure at the end of this
3 week, so a one week continuance will be insufficient to allow for adequate recovery.

4 6. As a result, Plaintiff and SGB have agreed to extend Plaintiff's response deadline
5 by two (2) weeks, until June 19, 2020.

6 7. This stipulation is not made for purposes of delay.

7 Dated this 3rd day of June, 2020

8 GREENSPOON MARDER, LLP

LIPSON NEILSON, P.C.

9
10 /s/ Phillip A. Silvestri, Esq.

/s/ Megan H. Hummel, Esq.

11 PHILLIP A. SILVESTRI, ESQ.
12 Nevada Bar No. 11276
13 3993 Howard Hughes Parkway, Suite 400
14 Las Vegas, NV 89169
15 *Attorneys for Plaintiff*
16 *Diamond Resorts Corporation*

17 JOSEPH P. GARIN, ESQ.
18 Nevada Bar No. 6653
19 MEGAN H. HUMMEL, ESQ.
20 Nevada Bar No. 12404
21 9900 Covington Cross Drive, Suite 120
22 Las Vegas, NV 89144-7052

23 *Attorneys for Defendant*
24 *Schroeter, Goldmark & Bender, P.S*

25 IT IS SO ORDERED

26 
27 UNITED STATES DISTRICT JUDGE

28 DATED: 6/4/2020

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3993 Howard Hughes Parkway, Suite 400
Las Vegas, Nevada 89169
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